



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JN/DKK/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 29, 2020

By Email and ECF

Thomas C. Green  
Mark D. Hopson  
Michael Levy  
Joan M. Loughnane  
Sidley Austin LLP

David Bitkower  
Matthew S. Hellman  
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Payroll and tax records	Discovery Material	DOJ_HUAWEI_A_0004874191 – DOJ_HUAWEI_A_0004875008
Financial institution records including account statements and Know Your Customer records	Discovery Material	DOJ_HUAWEI_A_0004875009 – DOJ_HUAWEI_A_0004876219
Financial institution records including Know Your Customer records, meeting minutes, and compliance records	Sensitive Discovery Material	DOJ_HUAWEI_A_0004876220 – DOJ_HUAWEI_A_0004878193
Memorandum; Record relating to licenses; and trade compliance records	Discovery Material	DOJ_HUAWEI_A_0004878194 – DOJ_HUAWEI_A_0004882150

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Julia Nestor  
Alexander A. Solomon  
Julia Nestor  
David K. Kessler  
Sarah Evans  
Assistant United States Attorneys  
(718) 254-7000

DEBORAH L. CONNOR  
Chief, Money Laundering and Asset  
Recovery Section, Criminal Division  
U.S. Department of Justice

By: /s/ Christian J. Nauvel  
Laura Billings  
Christian J. Nauvel  
Trial Attorneys

JAY I. BRATT  
Chief, Counterintelligence and Export  
Control Section  
National Security Division, U.S. Department  
of Justice

By: /s/ Thea D. R. Kendler  
Thea D. R. Kendler  
David Lim  
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)